



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

---

MEC:FTB  
F. #2015R00524

271 Cadman Plaza East  
Brooklyn, New York 11201

August 11, 2020

By ECF and Courtesy Copy by Interoffice Mail

The Honorable Pamela K. Chen  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re:    United States v. Donal O'Sullivan, Helen O'Sullivan  
and Padraig Naughton  
Criminal Docket No 20 Cr. 272(PKC)

Dear Judge Chen:

Pursuant to the Court's August 7, 2020 Order in the above-captioned matter, the government respectfully submits the accompanying Proposed Protective Order relating to the disclosure of grand jury information.

Respectfully submitted,

SETH D. DUCHARME  
Acting United States Attorney

By:    /s /Martin E. Coffey  
Martin E. Coffey  
Assistant U.S. Attorney  
(718) 254-6157

cc.    Sean F. O'Shea  
Attorney for Donal O'Sullivan

